

Date: July 20, 2015

Subject: Malone Service Company, Texas City, Galveston County, Texas

From: Warren Zehner, OSC, U.S. EPA, Region VI ERB (281/983-2229); David Abshire, FOSCR, U.S. EPA, Region VI Remedial (214/665-7188)

To: Director, OERR

******* RPB, EPA Region 6**

State Contact: Texas Commission on Environmental Quality (TCEQ)

POLREP NO.: 39

Event: Emergency Removal Action

Site SID No.: TXD980864789

Start Date: July 6, 2015

Demobilization Date: NA

Completion Date: NA

Site Type: Fixed Facility

Site latitude/Longitude: Lat: 29° 19' 59" N Long: 94° 54' 10" W

I. SITUATION

The Malone Service Company Superfund Site is a former commercial waste disposal facility located at 800 Campbell Bayou Road, Texas City, Galveston County, Texas. The former waste processing, storage and disposal facility is approximately 150-acres on the mainland shore of Galveston Bay in Texas City, Galveston County, Texas. The former facility is located in marsh/wetlands area, and surrounded by an approximate 18-foot high flood protection levee. The facility operated from 1964 to 1997 when its hazardous waste storage and disposal permits were revoked by the Texas Natural Resource Conservation Commission (TNRCC - presently called the Texas Commission on Environmental Quality). The former facility managed a wide range of hazardous and non-hazardous waste streams generated at off-site locations by the chemical, petroleum, petrochemical, plating, pesticide, and other industries. The facility operated two (2) hazardous waste disposal wells – WDW-138 and WDW-73. Onsite stormwater, potentially mixed with hazardous substances from leaking tanks, surface impoundments, and contaminated soil, was disposed in the two (2) underground hazardous waste injection wells located on-site. In May 1999, the last operational injection well failed, leaving no viable alternative for contaminated stormwater management.

The former facility came under the authority of the Superfund Program in 1998. Due to potential contaminated stormwater releases the Superfund Removal Program conducted a well workover on WDW-138 to manage the contaminated stormwater. The Potentially Responsible Parties (PRPs) assumed stormwater management activities in 2004. Presently, cleanup of the contaminated areas within the former facility is being addressed through a Remedial Action conducted by the Potentially Responsible Parties (PRPs).

One of the hazardous waste injection wells, WDW-138, has been used by Superfund Removal Program (1998 – 2004) and the PRPs (2004 – 6/16/15) under Superfund Remedial Program oversight (following all substantive requirements of the EPA UIC No-migration Petition and the Texas Commission on Environmental Quality [TCEQ] permit) for disposal of storm water that accumulates in the contaminated Solid Waste Management Units (SWMUs). The EPA UIC No Migration Petition, which permitted disposal of contaminated water through deep well injection expired on June 16, 2015; therefore, the PRPs were

required to cease injection operations. Therefore, to continue management of contaminated stormwater and prevent releases, the Superfund Program Remedial Branch requested, and received approval to continue stormwater management through Removal's Emergency Response.

II. ACTIONS TAKEN

The on-site hazardous waste injection well WDW-138 is being used by the Superfund Removal Program to address the contaminated water in the SWMUs as Removal had previously done in February 2004. An emergency response to address the potential release of contaminants from the SWMUs is warranted because the authorization to use WDW-138 under the UIC No-migration Petition has expired. The Units are being pumped down to prevent a release and to maintain more storage capacity for any additional storms during the hurricane season in this hurricane prone area. The pump-down is in accordance with the requirements of the approved Malone Service Company Superfund Site Storm Water Management Plan (March 11, 2014) and all substantive requirements of the EPA UIC No-migration Petition and the TCEQ permit.

EPA resumed control of the facility injection wells from the PRPs on July 6, 2015. Currently, EPA is conducting emergency pump down operations of the contaminated stormwater and other contaminated fluids from various units on the site. Freeboard levels became critical after the facility received torrential rain from tropical storm bill and subsequent rain. All contaminated fluids are being disposed of in injection well WDW-138. Pumping operations are currently centered on the six (6) acre Earthen Impoundment. From July 13 through July 19, 2015, approximately 542,327 gallons have been disposed from Site units; for a total volume to-date of 807,699 gallons injected. Previously, the injection was conducted on a 10-hour day; however, on July 15, 2015, injection is being conducted on a 24-hour day.

A "start-up" test was initiated on July 14, 2015, on the second on-site hazardous waste injection well - WDW-73 - to bring that injection well online to assist in stormwater disposal. Testing will evaluate piping, gauges, and the automated system; a falloff test will also be conducted to evaluate the capacity of the subsurface reservoir to accept fluids.

III. FUTURE PLANS

Continue injection operations to address potential release and maximize capacity for potential tropical storm/hurricanes.

IV. KEY ISSUES

None

V. DISPOSITION OF WASTE

VI. ATTACHMENTS

None